



State of New Jersey

DEPARTMENT OF EDUCATION

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WILLIAM L. LIBRERA
Commissioner

TO: Chief School Administrators
Business Administrators

FROM: Richard Rosenberg
Assistant Commissioner
Division of Finance

SUBJECT: Radon Testing in Schools

This memorandum is to alert you to the State's new radon testing requirements for public schools, in accordance with N.J.S.A. 18A:20-40, and provide information that will enable districts to begin budgeting for testing next year.

Following is a brief overview of the law and its implementation:

- The law requires that all public schools be tested for radon by September 2005, and then every five years thereafter.
- Child care centers operated by non-profit organizations within public schools are a priority, as required by law;
- Districts may wish to consider including radon testing as part of the scope development for major rehabilitation school facility projects, and requesting required remediation of "high" radon conditions (see below for additional radon information) to be funded as an eligible cost;
- The Office of School Facilities in the Department of Education (DOE) will permit districts to amend the Long-Range Facilities Plan (LRFP) to include remediation projects as an eligible health and safety renovation project; and
- Districts **must** undergo radon testing of all requisite school facilities as a condition for DOE approval of the LRFP, beginning with the 2005 submission.

The complete requirements and guidance for testing are being developed cooperatively by the DOE and the Department of Environmental Protection (DEP) and will be made available in the next few months. In the interim, it is important that districts consider including funds for testing and possible mitigation (remediation of radon) for the coming school year, 2003-04.

In short, the U.S. Environmental Protection Agency (EPA) and DEP recommend short-term testing (lasting 2-5 days) of all frequently occupied rooms (such as classrooms and offices) that are in contact with the ground or above basement spaces that are not frequently occupied. It is recommended that testing be done in the cold weather months of October through March, and during weekdays while the school is occupied, since more reliable test results can be obtained in colder weather when doors and windows are usually closed, and weekday tests provide a more accurate assessment of children's exposure.

NJDOE Memorandum to C.S.A.'s, BA's
January 27, 2003

The cost of testing is estimated to be in the range of \$20-50 per room, including laboratory analysis and all other costs, if done by a certified contractor. Schools may choose to have one of their employees exempted from New Jersey's certification requirements by taking a one-day course and receiving an exemption ID number; this will make it possible for them to conduct the testing themselves. The cost of testing in this case is estimated to be \$10-25 per room for the test device and analysis.

Radon testing is currently considered as an eligible required maintenance activity pursuant to N.J.A.C. 6:24-3.1(c)7. Thus, districts could be permitted to apply these radon testing costs to help satisfy the mandated two percent of the school facility's replacement cost for required maintenance over the course of ten years, pursuant to N.J.S.A. 18A:7G-9(b)1.

For rooms that are found to have a radon concentration of 4 picoCuries per Liter (pCi/L) or more, retesting is recommended by the DEP. If the retest confirms the presence of elevated radon levels of 4 pCi/L or more, the DEP recommends mitigation to reduce levels.

If a school chooses to bring in a mitigation contractor specifically to prepare a mitigation design that can be used for bidding purposes, the cost of the design work is estimated to range from \$2,000-10,000 depending on the size and complexity of the radon problem.

The cost of mitigation may range from \$2,000-5,000 per Active Soil Depressurization (ASD) system installed. ASD's vent the radon coming from the ground below the building to the air outside the building where it quickly disperses to low concentrations. Multiple ASD's may be needed if more than one or two rooms have elevated radon levels. Repairs and/or adjustments to the HVAC system, building shell and/or other building components would involve additional costs.

The DOE recommends that mitigation projects (design, approval, construction) be treated as a health and safety renovation with costs eligible for State support in the same manner as other health and safety projects.

The DOE strongly recommends that schools use the above information to begin planning and budgeting for radon testing now. The EPA and DEP recommend testing be done in the cold weather months of October – March. Schools will therefore have this six-month period during each of two years, 2003-04 and 2004-05, to complete the first round of testing by September 2005. All public school testing must be completed by September 2005. To avoid the situation in which there are too many schools seeking to test in 2004-05, and finding insufficient testing resources available to meet the demand, it is advisable that schools try to test earlier in the two years available.

Additional information on radon can be found at the DEP website, www.njradon.org.

RR/BP/er:radon